

# Exhibit 5

**From:** David Bouchard  
**Sent time:** 03/20/2023 10:20:10 AM  
**To:** Richens, Dana <DRICHENS@sgrlaw.com>  
**Subject:** RE: United Inn & Suites --- 30(b)(6) Deposition and Depositions of Tahir Shareef and Ashar Islam  
**Attachments:** 2023 - 03 - 20. Search Terms.xlsx

Good morning, Dana—

Further to my email below, I'm writing in regards to certain documents that came up during the depositions on February 22, 2023 of Mr. Islam, Mr. Shareef, and Northbrook's 30(b)(6) representative that we have requested but not received. I will not enumerate all those documents here, but they include business emails, business text messages, payroll records, and other critically relevant documents. We have not yet received the same documents, even though the depositions at issue occurred nearly one month ago and our original requests for production of documents served in September 2022 asked for such documents. To avoid any confusion about which documents we are still waiting to receive, we served supplemental requests for production of documents on February 24, 2023. Those supplemental requests essentially duplicate many of the requests we previously served in 2022. That is, the documents disclosed in depositions on February 22<sup>nd</sup> should have already been produced in response to the requests for production we served in September 2022.

I'm not sure how your client is going about reviewing its emails to identify the emails that should have been produced last year in response to Plaintiffs' outstanding discovery requests. I'd suggest that your client run search terms across its relevant email accounts and produce documents that hit on the search terms. I've attached a proposed list of search terms for your client to use. These terms should be run across the email accounts that your client used in connection with the hotel's business activities and operations. Any documents hitting on these terms should be produced. In my experience it is necessary to engage an e-discovery vendor to assist with collecting a client's relevant emails, running search terms, and producing the hits.

If you have any concerns with these terms, I trust that you'll promptly let me know so we can discuss and address your concerns. These documents are significantly past due in the litigation given we requested them last year, so let's please resolve efficiently any concerns you have about the search terms. Additionally, please let me know your plan to produce the documents hitting on these search terms in the near future. Thank you.

Best regards,

David

**David Bouchard** ([Bio](#))

*Partner*



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**From:** Will Story <WStory@hallboothsmith.com>  
**Sent:** Thursday, February 23, 2023 9:36 AM  
**To:** David Bouchard <david@finchmccranie.com>; Richens, Dana <drichens@sgrlaw.com>; Ward, Emily <eward@sgrlaw.com>  
**Subject:** RE: United Inn & Suites --- 30(b)(6) Deposition and Depositions of Tahir Shareef and Ashar Islam

David,

Thanks for your email. I agree with you that there were several subject areas that came up yesterday where Mr. Shareef and/or Mr. Islam represented that they may have responsive documents (including the gmail account and text messages). If you could provide us supplemental discovery requests that would be great, but I will go ahead and start working on the responsive material.

Furthermore, in these cases, I find it extremely helpful to both sides when the request for communications via email have "key terms" provided that we can use in searching the communications.

Also, and I'm not sure if we ever said it on the record, but I agree with you (and agreed with you yesterday) that you have the right to re-depose Mr. Shareef and Mr. Islam to the extent that these supplemental documents contain new information that was not covered yesterday. We might need to do a discovery extension. Honestly, I will be in a better position to know that by midweek next week.

Thanks for your email David, and as always, for your professionalism throughout this litigation. I'll be in touch soon.

Emily — Hope Tina Turner crushed it!!!

## Will Story

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**From:** David Bouchard <[david@finchmccranie.com](mailto:david@finchmccranie.com)>

**Sent:** Thursday, February 23, 2023 9:18 AM

**To:** Will Story <[WStory@hallboothsmith.com](mailto:WStory@hallboothsmith.com)>; Richens, Dana <[drichens@sgrlaw.com](mailto:drichens@sgrlaw.com)>; Ward, Emily <[eward@sgrlaw.com](mailto:eward@sgrlaw.com)>

**Subject:** United Inn & Suites --- 30(b)(6) Deposition and Depositions of Tahir Shareef and Ashar Islam

Good morning –

I'm following up to memorialize an issue that Will and I briefly discussed yesterday off the record. Mr. Shareef and Mr. Islam both testified yesterday to the existence of documents that are very likely to be probative of key issues in the lawsuits filed by JG, GW, and AG, but that have not been produced despite discovery requests from each of the plaintiffs seeking such documents. For purposes of illustration only, both Mr. Shareef and Mr. Islam testified under oath that as of 2017 – 2019 the United Inn & Suites used a Gmail account to send and receive emails relating to the hotel's operations. No emails from that account have been produced to date despite plaintiffs' respective requests for production that encompass such emails. To give another example, both Mr. Shareef and Mr. Islam testified to text messages with the officers who provided security at the property for 4 hours per day from 2017 – 2019. None of those messages have been produced despite plaintiffs' respective requests for production that encompass such texts. There are other categories of documents that came up yesterday, but the foregoing examples should suffice to make the point.

To avoid any confusion or doubt about what plaintiffs are requesting in discovery (and have previously requested), plaintiffs will serve supplemental discovery requests in each of the three cases related to the new categories of documents disclosed for the first time yesterday.

Based on yesterday's testimony revealing the existence of several new categories of documents that plaintiffs requested months ago but that have not been produced, plaintiffs in each of the three lawsuits against UI&S reserve the right to re-open each of the depositions taken yesterday. I recognize it may take some time to produce the documents newly disclosed yesterday and plaintiffs will obviously then need time to review them before deciding whether to re-open the depositions. Depending on the volume of documents that are encompassed by the supplemental requests, we may need to go back to the court to request further extensions of the discovery period. I think that depends on the volume, which I'll need to hear from you about.

Thanks, and let me know if you'd like to discuss further.

Best regards,

David

**David Bouchard** ([Bio](#))

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threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.

AAHOA						
GHLA						
AHLA						
"American Hotel"~3						
"American Lodging"~3						
"Asian Hotel"~5						
ECPAT						
Polaris						
TVPA						
TVPRA						
Traffick*						
Underage*						
Minor*						
child*						
Adolescen*						
Kid*						
Cop*						
enforce*						
"Department of Homeland Security"						
DHS						
"Blue Campaign"~3						
FBI*						
GBI*						
Guard*						
"DeKalb County"~3						
PD						
Police*						
"Law enforcement"						
"Task force"~3						
911						
Arrest*						
Strickland						
Weber						
Webber						
McClelland						
officer*						
Undercover*						
hotspot						
"hot spot"						
secur*						
Rescue*						
Safe*						
Surveil*						
Ordinanc*						
purchaser*						
buyer*						
Johns						
Kikia						
"Kikia Anderson"~2						
"Obie"						

"Carr"						
Dontavis						
Dontavious						
Genesis						
Alyssa						
Grimes						
Bush						
Antwan						
Quinton						
Broncheau						
Rustemeyer						
Raevyn						
Endco						
Corey						
Forrest						
"Victoria Thomas"~2						
Keiron						
"Room* 145"~10						
"Room* 117"~10						
Train*						
"red flag*"~5						
warn*						
"Working girl*"~2						
Brothel*						
Hoe*						
Hooker*						
Prostitut*						
Whor*						
Escort*						
"Lad* night"~2						
Slut*						
Stripper*						
Condom*						
Pander*						
Pimp*						
Scant*						
Sex*						
Screw*						
Bang*						
Fuck*						
Solicit*						
Sting*						
"don't rent"~5						
"do rent"~5						
Listcrawler						
Megapersonal						
onlyfans						
Backpage						
"adult friend finder"						
"Customer review*"~3						

"Online review*"~3							
TripAdvisor OR "Trip Advisor" OR Priceline OR Expedia OR orbitz OR Google OR Booking OR "Hotels.com" or Yelp							
Craigslist							
Complain*							
Prohibit*							
Ban*							
Threat*							
Unlaw*							
Violen*							
Loiter*							
Illegal*							
Harass*							
Gang*							
Gun*							
Crime*							
Crimin*							
Drug*							
Assault*							
Murder*							
Homicide*							
Batter*							
Blood*							
Cloth*							
Duration*							
Hygen*							
Hygien*							
Lingerie*							
Malnourish*							
"Physical deteriorat*"~2							
"Sleep deprivat*"~2							
"Excess* linen*"~2							
"Excess* sheet*"~2							
"Excess* towel*"~2							
"extra linen*"~2							
"extra sheet*"~2							
"extra towel*"~2							
"loads linen*"~2							
"loads sheet*"~2							
"loads towel*"~2							
"lots linen*"~2							
"lots sheet*"~2							
"lots towel*"~2							
"many linen*"~2							
"many sheet*"~2							
"many towel*"~2							
"multiple linen*"~2							
"multiple sheet*"~2							
"multiple towel*"~2							
"several linen*"~2							
"several sheet*"~2							

"several towel*"~2						
bank*						
loan*						
lend*						
advance*						
payroll						
"W2"						
1099						
salar*						
wage*						
sabharwal						
harsimran						